

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TEXAS A&M QUEER EMPOWERMENT  
COUNCIL,

*Plaintiff,*

v.

WILLIAM “BILL” MAHOMES, ROBERT  
L. ALBRITTON, DAVID C. BAGGETT,  
JOHN W. BELLINGER, JAMES R.  
“RANDY” BROOKS, JAY GRAHAM,  
MICHAEL A. “MIKE” HERNANDEZ III,  
MICHAEL J. PLANK, SAM TORN, CAGE  
SAWYERS, JOHN SHARP, and MARK A.  
WELSH, in their official capacities,

*Defendants.*

Civil Case No. 4:25-cv-992

**SUPPLEMENTAL DECLARATION OF  
ALEXSANDRIA “ALEX” GONCE IN  
SUPPORT OF PLAINTIFF’S MOTION FOR  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

J.T. Morris  
(Tex. Bar No. 24094444; S.D. Tex. Bar  
No. 3163670)  
FOUNDATION FOR INDIVIDUAL  
RIGHTS AND EXPRESSION  
700 Pennsylvania Ave., Suite 340  
Washington, DC 20003  
(215) 717-3473  
jt.morris@thefire.org

Adam Steinbaugh  
(Cal. Bar No. 304829)\*  
Jeffrey D. Zeman  
(Mich. Bar No. P76610)\*  
FOUNDATION FOR INDIVIDUAL  
RIGHTS AND EXPRESSION  
510 Walnut St., Ste. 900  
Philadelphia, PA 19106  
(215) 717-3473  
adam@thefire.org  
jeff.zeman@thefire.org

\* Admitted *pro hac vice*

*Attorneys for Plaintiff Queer Empowerment Council*

**DECLARATION**

I, Aleksandria “Alex” Gonce, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this Declaration.

2. I am a student at Texas A&M University in College Station.

3. I am the Events Chair and Treasurer of Texas A&M Queer Empowerment Council, the plaintiff in this action.

4. Prior to February 28, 2025, Texas A&M Queer Empowerment Council had reservations to use Rudder Theatre, in the Rudder Theater Complex at Texas A&M University, on March 26 and 27, 2025 to rehearse, set up, and perform *Draggieland*.

5. Before February 28, 2025, the Memorial Student Center Box Office at Texas A&M University had sold tickets for the March 27, 2025 performance of *Draggieland*.

6. On February 28, 2025, Interim Associate Vice President Thomas W. Reber sent the Queer Empowerment Council an email notifying us that because the Board had adopted the Drag Ban Resolution, “your event, *Draggieland* 2025, will not be permitted on campus.”

7. Texas A&M University then suspended ticket sales for *Draggieland* and issued refunds to anyone who had already purchased tickets for the March 27 performance.

8. No member of Texas A&M Queer Empowerment Council suspended ticket sales or issued refunds for the March 27 performance of *Draggieland*.

9. Texas A&M University’s cancellation of *Draggieland* 2025 is contrary to the Queer Empowerment Council’s wishes.

10. To maintain the status quo and preserve our access to the Rudder Theatre, the Queer Empowerment Council has maintained its reservations of the Rudder Theatre for March 26 and 27, 2025, even though we are barred from holding the intended event (that is, *Draggieland*).

11. On March 3, 2025, Rudder Theatre Senior Stage Manager Krissie Day sent me an email confirming that Texas A&M Queer Empowerment Council still had a reservation to use Rudder Theatre on March 26 and 27, 2025.

12. Day's March 3 reservation confirmation listed the event as "QEC Variety Show."

13. On Monday, March 10, 2025, I met with Texas A&M Interim Vice President for Student Affairs Thomas W. Reber to seek clarification regarding what Texas A&M University would permit on stage for the "QEC Variety Show."

14. Interim Vice President Reber was unable to give me any guidance as to how to bring our performance into compliance with the Board of Regents' February 28, 2025 resolution.

15. To my knowledge, the Queer Empowerment Council's March 26–27 Rudder Theatre reservation remains confirmed.

16. The Queer Empowerment Council wants and is ready, willing, and able to proceed with *Draggieland* 2025 on March 27, 2025, in the Rudder Theatre.

17. If permitted by Texas A&M University, or by Court order, Texas A&M Queer Empowerment Council would use its March 26–27 Rudder Theater reservation to rehearse, set up, and perform *Draggieland* 2025.

18. Because of Defendants' cancellation of *Draggieland* 2025, Texas A&M Queer Empowerment Council has sought, but has not yet secured, a possible alternative venue to perform *Draggieland* on March 27, 2025:

- a. On February 28, Texas A&M Queer Empowerment Council members called Brazos Center, but were informed the venue was unavailable. Even if it were available, the venue is approximately five miles away from the on-campus Rudder Theatre.
- b. On February 28, Texas A&M Queer Empowerment Council members called Brazos County Expo Complex, but were informed the venue was unavailable. Even if it were available, the venue is approximately eight miles away from the on-campus Rudder Theatre.
- c. Wolf Pen Creek Amphitheater is an outdoor venue, which not only risks weather impediments and the unauthorized appearance of unticketed attendees but lacks the requisite seating, accessibility, or equipment to host *Draggieland 2025*, and is approximately three miles away from the on-campus Rudder Theatre.
- d. The amphitheater at Hilton College Station and Conference Center seats only 100 people and is approximately two miles away from the on-campus Rudder Theatre; its grand ballroom, though larger, has no backstage capacity, a requirement for *Draggieland*.
- e. The Theatre Company of Bryan/College Station has advised us that its theater may be available, but it seats only 240 people and is approximately three miles away from the on-campus Rudder Theatre. We have not yet been able to complete a reservation of this space and are not certain it will be available.

19. An off-campus venue, particularly one that is distant from campus, will frustrate our ability to reach our intended audience, which is largely composed of on-campus undergraduate students.

I declare under penalty of perjury that the foregoing is true and correct.

Signed in College Station, Texas this 17<sup>th</sup> day of March, 2025.

Alexsandria Gonce  
Alexsandria "Alex" Gonce